This document gives pertinent information concerning the reissuance of the VPDES Permit listed below. This permit is being processed as a Minor, Industrial permit. The discharge results from the operation of a 12 MGD (production) water treatment plant. This permit action consists of updating the proposed effluent limits to reflect the current Virginia WQS (effective January 6, 2011) and updating permit language, as appropriate, to reflect current boilerplate. The effluent limitations and special conditions contained in this permit will maintain the Water Quality Standards of 9VAC25-260-00 et seq.

1. Facility Name and Mailing Manassas WTP SIC Code: 4941 WTP

Address: 8500 Public Works Drive

Manassas, VA 20110

Facility Location: 14329 Glenkirk Road County: Prince William

Nokesville, VA 20181

Facility Contact Name: Mr. Tony H. Dawood Telephone Number: (703) 257-8382

2. Permit No.: VA0050181 Expiration Date of previous permit: April 6, 2011

Other VPDES Permits associated with this facility:

N/A

Other Permits associated with this facility:

Air – Registration Number 73229

Petroleum - 3004990

E2/E3/E4 Status: E3

3. Owner Name: City of Manassas

Mr. Tony H. Dawood /

Owner Contact/Title: Deputy Director - Water and Telephone Number: (703) 257-8382

Sewer

4. Application Complete Date: November 4, 2010

Permit Drafted By: Susan Mackert Date Drafted: February 8, 2011

Draft Permit Reviewed By: Alison Thompson Date Reviewed: February 14, 2011

Draft Permit Reviewed By: Bryant Thomas Date Reviewed: April 6, 2011

Public Comment Period: Start Date: March 8, 2011 End Date: April 6, 2011

5. Receiving Waters Information: See Attachment 1 for the Flow Frequency Determination

Receiving Stream Name :Broad RunStream Code:1aBRUDrainage Area at Outfall:60 square milesRiver Mile:15.54Stream Basin:PotomacSubbasin:Potomac

Section: 7a Stream Class: III

Special Standards: g Waterbody ID: VAN-A19R
7Q10 Low Flow: 0 MGD 7Q10 High Flow: 0 MGD

1Q10 Low Flow: 0 MGD 1Q10 High Flow: 0 MGD

Harmonic Mean Flow: 0 MGD 30Q5 Flow: 0 MGD

303(d) Listed: Yes 30Q10 Flow: 0 MGD

TMDL Approved: Yes Date TMDL Approved: November 15, 2006 (E. coli)

6. Statutory or Regulatory Basis for Special Conditions and Effluent Limitations:

✓ Clean Water Act ✓ Water Quality Standards

✓ VPDES Permit Regulation ✓ Other: 9VAC25-860

✓ EPA NPDES Regulation

7.	Licensed Operator Requirements: N/A								
8.	Relia	bility Class: N/A							
9.	Permit Characterization:								
		Private		Effluent Limited		Possible Interstate Effect			
		Federal	√	Water Quality Limited		Compliance Schedule Required			
		State	√	Toxics Monitoring Program Required		Interim Limits in Permit			
	✓	Municipal		Pretreatment Program Required		Interim Limits in Other Document			
	✓	TMDL							

10. Wastewater Sources and Treatment Description:

Potable Water Production

The City of Manassas withdraws water from Lake Manassas as the raw water source for the Manassas Water Treatment Plant. The Virginia Department of Health permitted production for the water treatment plant is 12 Million Gallons per Day (MGD). Potable water is provided to residents of the City of Manassas, the City of Manassas Park, and western Prince William County.

Raw water is treated by the addition of ferric sulfate and sodium hypochlorite. The water is then split between the East side, West side, and pulsators. The treatment units on the East and West sides are conventional water treatment units with separate flocculation and sedimentation basins followed by filtration. There are two flocculation and sedimentation basins and four filters on each side. The pulsators are upflow clarifiers followed by filtration; there are four filters for the pulsators. Following filtration, the water is chlorinated for primary disinfection and stored in the clearwell prior to distribution. The water is then treated with caustic soda, fluoride, and sodium hexametaphosphate prior to distribution.

Wastewater Sources and Treatment

Settled solids (sludge) from the clarifiers are pumped to the sludge thickener and are ultimately transported to the Upper Occoquan Service Authority (VA0024988).

Wastewater is generated from the backwashing of filters, from pulsator blowdown, and from sedimentation basin cleaning. The filter backwash and pulsator blowdown flow directly to the surge tank for sedimentation. The solids from the sedimentation basins are first emptied into the thickener, and the clarified water is discharged to the surge tank. Discharge from the surge tank is conducted manually with the clarified water being mixed with sulfur dioxide for dechlorination prior to discharge to Broad Run.

Outfall 001

Discharge via Outfall 001 is intermittent in nature occurring three times a week for four hours at a time. The average discharge is approximately 0.349 MGD with a maximum of 1.0 MGD. Because the discharge from this outfall is comprised solely of industrial wastewater, quarterly visual examinations of storm water quality are not required.

Outfall 002

With this reissuance, Outfall 002 has been added to the permit and designated as an industrial wastewater discharge / comingled storm water overflow. Under typical conditions this outfall does not discharge. However, there are industrial processes within the drainage area of the outfall. Should there be an operational problem and/or failure within the drainage area industrial process water would flow to the retention pond. As such, there is reasonable potential for an industrial wastewater and/or comingled storm water discharge from the retention pond. Compliance sampling shall be conducted once per month in which there is a discharge from the retention pond. Because the discharge from this outfall is comprised of industrial wastewater and/or comingled storm water, quarterly visual examinations of storm water quality are not required.

Outfall 902

A discrete storm water discharge would only occur when the retention pond overflows due to a significant rain event. With this reissuance, Outfall 902 has been added to the permit and designated as an emergency storm water overflow. Compliance sampling shall be conducted once per discharge from the retention pond. Visual examinations of storm water quality shall be conducted once per discharge from the retention pond rather than quarterly.

See Attachment 2 for the NPDES Permit Rating Worksheet.

See Attachment 3 for a facility schematic/diagram.

TABLE 1 – Outfall Description									
Outfall Number	Discharge Sources	Treatment	Average Flow	Outfall Latitude and Longitude					
001	Industrial Wastewater	See Item 10 above.	0.349 MGD	38° 45' 44? N 77° 37' 16? W					
002	Industrial Wastewater / Comingled Storm Water	Sedimentation	No Discharge	38° 45' 42? N 77° 37' 13? W					
902	Storm Water	Sedimentation	No Discharge	38° 45' 42? N 77° 37' 13? W					
See Attachment 4 for (Gainesville Quad, DEQ #206D) topographic map.									

11. Sludge Treatment and Disposal Methods:

The industrial solids generated at this water treatment plant are allowed to settle in a thickener and are then transported to the Upper Occoquan Service Authority (VA0024988) in Centreville for final treatment and disposal.

12. Discharges, Intakes, Monitoring Stations, Other Items in Vicinity of Discharge:

The facilities and monitoring stations listed below either discharge to or are located within the waterbody VAN-A19R and discharge to Broad Run or an unnamed tributary to Broad Run. See Attachment 5 for a list of all other facilities and monitoring stations located within the waterbody VAN-A19R.

	TABLE 2
1aBRU011.48	DEQ monitoring station located at the Sudley Manor Drive bridge crossing (Broad Run)
VA0088510	Prince William County – Balls Ford Road Yard Waste Composting Facility (Broad Run, UT)
VAG110111	Ennstone Incorporated – Manassas (Broad Run, UT)
VAG110313	Hanson Pipe and Precast Incorporated (Broad Run, UT)
VAG406038	Eric J. Rubb Residence (Broad Run, UT)
VAG406071	Judith D. Nossaman Residence (Broad Run, UT)
VAG406079	Donnie E. Boggs Residence (Broad Run, UT)
VAG406231	Carlos Franco Residence (Broad Run, UT)
VAG406234	Jason Kuhlberg Residence (Broad Run, UT)
VAG406260	Daniel W. Gooding Residence (Broad Run, UT)
VAG406308	Allen T. Lindholm Property (Broad Run, UT)
VAG406313	June M. Burke Residence (Broad Run, UT)
VAG406314	Bull Run Mountains Conservancy, Incorporated (Broad Run)
VAG406316	Barry and Beeren Residence (Broad Run, UT)
VAG406401	Harlowe Residence (Broad Run, UT)
VAG406403	Jose Hernandez Residence (Broad Run, UT)
VAG406473	Raymond Gagnon Residence (Broad Run, UT)
VAG406476	Buckland Market (Broad Run, UT)
VAG406478	Andrew Talcott Residence (Broad Run, UT)
VAG406488	Buckland Mill Road Residence (Broad Run, UT)
VAG406503	Stephen Bashore Residence (Broad Run, UT)
VAR051085	Quarles Petroleum – Manassas Bulk Plant (Broad Run, UT)
VAR051290	Henry's Wrecker Service - Manassas (Broad Run, UT)
VAR051476	Old Dominion Freight Line Incorporated - Bristow (Broad Run, UT)
VAR051639	Potomac Disposal Services of Virginia, LLC (Broad Run)
VAR051886	Virginia Railway Express – Broad Run Yard (Broad Run)
VAR051927	Dulles Aviation Incorporated (Broad Run)
VAR051949	Chemung Contracting Corporation (Broad Run, UT)

13. Material Storage: Please see Attachment 6 for a complete list of significant materials stored and the associated best management practices in place.

14. Site Inspection: Performed by Susan Mackert on September 16, 2010. The site visit confirms that the application packages received on October 5, 2010, and November 2, 2010, are accurate and representative of actual site conditions. The site visit memo can be found as Attachment 7.

15. Receiving Stream Water Quality and Water Quality Standards:

a) Ambient Water Quality Data

The nearest Department of Environmental Quality ambient water quality monitoring station, 1aBRU011.48 on Broad Run, is located in segment VAN-A19R_BRU02A00 approximately four miles downstream from the location of Outfall 001. This segment begins at the confluence with Rocky Branch and continues downstream until the confluence with Cannon Branch. The receiving stream, Broad Run, is listed on the current 303(d) list.

The 2010 Virginia Water Quality Assessment 305(b)/303(d) Integrated Report (IR) gives an impaired classification for the following:

Recreation Use Impairment

VAN-A19R_BRU02A00: Sufficient excursions from the maximum *E. coli* bacteria criterion (8 of 24 samples – 33.3%) were recorded at DEQ's ambient water quality monitoring station (1aBRU011.48) at the Sudley Manor Road crossing to assess this stream segment as not supporting of the recreation use goal for the 2010 water quality assessment. The segment was previously listed for a fecal coliform bacteria impairment from 2002 through 2004. The *E. coli* bacteria impairment was first listed in 2006.

The following Total Maximum Daily Load (TMDL) has been established.

Occoquan Streams Bacteria TMDL (E. coli) – Approved by EPA November 15, 2006

The bacteria TMDL for the Occoquan Streams considered all upstream facilities. Because this industrial facility is not expected to discharge the contaminant of concern (*E. coli*) it did not receive a WLA in the TMDL.

The complete planning statement is located within the permit reissuance file.

b) Receiving Stream Water Quality Criteria

Part IX of 9VAC25-260(360-550) designates classes and special standards applicable to defined Virginia river basins and sections. The receiving stream, Broad Run, is located within Section 7a of the Potomac River Basin, and classified as a Class III water.

At all times, Class III waters must achieve a dissolved oxygen (D.O.) of 4.0 mg/L or greater, a daily average D.O. of 5.0 mg/L or greater, a temperature that does not exceed 32°C, and maintain a pH of 6.0-9.0 standard units (S.U.).

Attachment 8 details other water quality criteria applicable to the receiving stream.

Staff has re-evaluated receiving stream ambient monitoring data for pH, temperature, and hardness (expressed as mg/L calcium carbonate) and finds no significant differences from the data used during the last reissuance. Therefore, the previously established pH, temperature, and hardness values will be carried forward as part of this reissuance. Data comparison from DEQ's ambient water quality monitoring station 1ABRU007.58 on Broad Run are presented below.

TABLE 3 – Ambient Monitoring Data Comparison						
	2011 Reissuance					
pН	7.8 S.U.	8.0 S.U.				
Temperature	23.9°C	24.5°C				
Hardness	76 mg/L	80 mg/L				

Because no effluent data is available for temperature or hardness, staff had to utilize a default temperature value of 25° C and a default hardness value of 50 mg/L CaCO_3 for these parameters. The 90th percentile pH value of 7.14 S.U. was derived from reported effluent data from 2006 - 2010.

c) Receiving Stream Special Standards

The State Water Control Board's Water Quality Standards, River Basin Section Tables (9VAC25-260-360, 370 and 380) designates the river basins, sections, classes, and special standards for surface waters of the Commonwealth of Virginia. The receiving stream, Broad Run, is located within Section 7a of the Potomac River Basin. This section has been designated with a special standard of "g".

Special Standard "g" refers to the Occoquan Watershed policy (9VAC25-410). The regulation sets stringent treatment and discharge requirements in order to improve and protect water quality, particularly since the waters are an important water supply for Northern Virginia. The regulation generally prohibits new STPs and only allows minor industrial discharges.

d) Threatened or Endangered Species

The Virginia DGIF Fish and Wildlife Information System Database was searched on February 7, 2011, for records to determine if there are threatened or endangered species in the vicinity of the discharge. The following threatened or endangered species were identified within a 2 mile radius of the discharge from both Outfall 001 and Outfall 002: Brook Floater, Upland Sandpiper, Loggerhead Shrike, Henslow's Sparrow, Bald Eagle, and the Migrant Loggerhead Shrike. The limits proposed in this draft permit are protective of the Virginia Water Quality Standards and therefore, protect the threatened and endangered species found near the discharge locations.

16. Antidegradation (9VAC25-260-30):

All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect these uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The receiving stream has been classified as Tier 1 based on the stream having a 7Q10 and 1Q10 of zero. At times the stream is comprised of only effluent and storm water from this facility. Effluent limits were derived to meet the WQS. Permit limits proposed have been established by determining wasteload allocations which will result in attaining and/or maintaining all water quality criteria which apply to the receiving stream, including narrative criteria. These wasteload allocations will provide for the protection and maintenance of all existing uses.

17. Effluent Screening, Wasteload Allocation, and Effluent Limitation Development:

To determine water quality-based effluent limitations for a discharge, the suitability of data must first be determined. Data is suitable for analysis if one or more representative data points is equal to or above the quantification level ("QL") and the data represent the exact pollutant being evaluated.

Next, the appropriate Water Quality Standards (WQS) are determined for the pollutants in the effluent. Then, the Wasteload Allocations (WLA) are calculated. In this case since the critical flows 7Q10 and 1Q10 have been determined to be zero, the WLA's are equal to the WQS. The WLA values are then compared with available effluent data to determine the need for effluent limitations. Effluent limitations are needed if the 97th percentile of the daily effluent concentration values is greater than the acute wasteload allocation or if the 97th percentile of the four-day average effluent concentration values is greater than the chronic wasteload allocation. Effluent limitations are based on the most limiting WLA, the required sampling frequency, and statistical characteristics of the effluent data.

a) Effluent Screening:

Effluent data obtained from the Discharge Monitoring Reports (DMR) and permit application has been reviewed and determined to be suitable for evaluation. There have been no exceedances of the established limitations.

The following pollutants require a wasteload allocation analysis: Total Residual Chlorine.

b) Mixing Zones and Wasteload Allocations (WLAs):

Wasteload allocations (WLAs) are calculated for those parameters in the effluent with the reasonable potential to cause an exceedance of water quality criteria. The basic calculation for establishing a WLA is the steady state complete mix equation:

 $= \frac{C_{o} [Q_{e} + (f)(Q_{s})] - [(C_{s})(f)(Q_{s})]}{Q_{e}}$ WLA = Wasteload allocation Where: WLA C_{o} = In-stream water quality criteria Q_e = Design flow Q_s = Critical receiving stream flow (1Q10 for acute aquatic life criteria; 7Q10 for chronic aquatic life criteria; harmonic mean for carcinogen-human health criteria; 30Q10 for ammonia criteria, and 30Q5 for non-carcinogen human health criteria) f = Decimal fraction of critical flow C_{s} = Mean background concentration of parameter in the receiving

The water segment receiving the discharge via Outfall 001 is considered to have a 7Q10 and 1Q10 of 0.0 MGD. As such, there is no mixing zone and the WLA is equal to the C_0 .

c) Effluent Limitations Toxic Pollutants, Outfall 001 and Outfall 002

9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Those parameters with WLAs that are near effluent concentrations are evaluated for limits.

The VPDES Permit Regulation at 9VAC25-31-230.D. requires that monthly and weekly average limitations be imposed for continuous discharges from POTWs and monthly average and daily maximum limitations be imposed for all other continuous non-POTW discharges.

1) Total Residual Chlorine:

Chlorine is used in the production process and is potentially in the discharge. Staff calculated WLAs for TRC using current critical flows. In accordance with current DEQ guidance, staff used a default data point of 0.2 mg/L and the calculated WLAs to derive limits. The calculated limitations generated a monthly average and a daily maximum of 0.016 mg/L (see Attachment 8).

However, the *VPDES General Permit for Potable Water Treatment Plants*, 9VAC25-860, has set a monthly average and daily maximum of 0.011 mg/L for TRC. Since these limitations are more stringent, a monthly average and daily maximum TRC limitation of 0.011 mg/L is proposed for this reissuance for both Outfall 001 and Outfall 002.

Outfall 001

A monitoring frequency of once per quarter (1/3M) is proposed to continue with this reissuance based on the compliance history with the effluent limitations. This monitoring frequency is in accordance with 9VAC25-860 et seq. which also allows for quarterly sampling.

Outfall 002

Because Outfall 002 is a new outfall location with this reissuance and it is also considered an intermittent discharge, a monitoring frequency of once per month in which a discharge occurs (1/M) is proposed with this reissuance. This monitoring frequency meets the intent of the requirements found within 9VAC25-860 et seq.

2) Tributyltin:

During the previous reissuance of the permit, Appendix A monitoring indicated an unusual occurrence of Tributyltin in the discharge from Outfall 001. A monitoring program was implemented to compile additional data to assist in a later determination of whether a Tributyltin limit was warranted. Based on DMR monitoring data submitted from 2006 - 2010, it is staff's best professional judgement that a Tributyltin limit is not warranted and that monitoring is no longer necessary with this reissuance. Please see Attachment 8 for DMR data.

d) <u>Effluent Limitations and Monitoring - Conventional and Non-Conventional Pollutants, Outfall 001 and</u> Outfall 002

1) Total Suspended Solids:

The VPDES General Permit for Potable Water Treatment Plants, 9VAC25-860, has set a monthly average limitation of 30 mg/L and a daily maximum limitation of 60 mg/L for TSS.

Outfall 001

No changes to the Total Suspended Solids (TSS) limitations are proposed. The monthly average limitation of 30 mg/L and the daily maximum limitation of 60 mg/L are proposed to continue with this reissuance. These limits are based on staff's best professional judgement and are also in accordance with 9VAC25-860-10 et seq.

A monitoring frequency of once per quarter (1/3M) is proposed to continue with this reissuance based on the compliance history with the effluent limitations.

Outfall 002

A monthly average of 30 mg/L and a daily maximum of 60 mg/L for TSS are proposed for reissuance.

Because Outfall 002 is a new outfall location with this reissuance and it is also considered an intermittent discharge, a monitoring frequency of once per month in which a discharge occurs (1/M) is proposed with this reissuance. This monitoring frequency meets the intent of the requirements found within 9VAC25-860 et seq.

2) pH:

Limitations for pH are set at the water quality criteria.

Outfall 001

No changes to pH limitations are proposed. These limits are in accordance with 9VAC25-860-10 et seq.

A monitoring frequency of once per quarter (1/3M) is proposed to continue with this reissuance.

Outfall 002

Because Outfall 002 is a new outfall location with this reissuance and it is also considered an intermittent discharge, a monitoring frequency of once per month in which a discharge occurs (1/M) is proposed with this reissuance. This monitoring frequency meets the intent of the requirements found within 9VAC25-860 et seq.

e) Effluent Limitations, Outfall 902 – Storm Water Only Pollutants.

VA-DEQ Guidance Memo 96-001 recommends that chemical water quality-based limits not be placed on storm water outfalls at this time because the methodology for developing limits and the proper method of sampling is still a concern and under review/reevaluation by EPA. Exceptions would be where a VPDES permit for a storm water discharge has been issued that includes effluent limitations (backsliding must be considered before these limitations can be modified) and where there are reliable data, obtained using sound, scientifically defensible procedures, which provide the justification and defense for an effluent limitation.

With this reissuance, Outfall 902 has been designated as an emergency storm water overflow with compliance sampling to be conducted once per discharge from the retention pond for the following parameters: TSS, TRC, pH, and flow. Visual examinations of storm water quality shall be conducted once per discharge from the retention pond rather than quarterly.

f) Effluent Limitations and Monitoring Summary.

The effluent limitations and monitoring requirements are presented in the following table. Limits were established for Total Suspended Solids, pH, and Total Residual Chlorine.

The limits for Total Suspended Solids and Total Residual Chlorine are based 9VAC25-860-10 et seq.

Sample Type and Frequency are in accordance with the recommendations in the VPDES Permit Manual, and 9VAC25-860-10 et seq.

18. Antibacksliding:

All limits in this permit are at least as stringent as those previously established. Backsliding does not apply to this reissuance

19a. Effluent Limitations/Monitoring Requirements: Outfall 001 (Industrial Wastewater Discharge)

Average flow is 0.349 MGD

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS		MONITORING REQUIREMENTS				
	LIMITIS	Monthly Average	<u>Daily Maximum</u>	<u>Minimum</u>	<u>Maximum</u>	<u>Frequency</u>	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/3M ^a	Estimate
pН	2	NA	NA	6.0 S.U.	9.0 S.U.	$1/3M^a$	Grab
Total Suspended Solids (TSS)	1,3	30 mg/L	60 mg/L	NA	NA	$1/3M^a$	5G/8H-C
Total Residual Chlorine	2,3	0.011 mg/L	0.011 mg/L	NA	NA	$1/3M^a$	Grab
Acute Toxicity – C. dubia (TU _a)	NA	NA	NA	NA	NL	1/YR ^b	5G/8H-C
Acute Toxicity – P. promelas (TU _a)	NA	NA	NA	NA	NL	1/YR ^b	5G/8H-C

The basis for the limitations codes are:

MGD = Million gallons per day.

1/3M = Once every three months.

1. Best Professional Judgement

NA = Not applicable.

1/YR = Once every year.

2. Water Quality Standards

NL = No limit; monitor and report.

3. 9VAC25-860 (VPDES General Permit for Potable Water Treatment Plants)

S.U. = Standard units.

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

5G/8H-C = 5 Grab/Eight Hour Composite - Consisting of five (5) grab samples collected at hourly intervals until the discharge ceases or five (5) grab samples taken at equal time intervals for the duration of the discharge if the discharge is less than eight (8) hours in length.

- a. The quarterly monitoring periods shall be January 1 March 31, April 1 June 30, July 1 September 30 and October 1 December 31. The DMR shall be submitted no later than the 10th day of the month following the monitoring period (April 10, July 10, October 10 and January 10, respectively).
- b. The annual monitoring period shall be January 1 December 31. The DMR shall be submitted no later than the 10^{th} day of the month following the monitoring period (January 10).

19b. Effluent Limitations/Monitoring Requirements: Outfall 002 (Industrial Wastewater / Comingled Storm Water Overflow)

Average flow is variable.

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS]	DISCHARGE LIM	MONITORING REQUIREMENTS			
	LIMITS	Monthly Average	<u>Daily Maximum</u>	<u>Minimum</u>	<u>Maximum</u>	<u>Frequency</u>	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/M	Estimate
pН	2	NA	NA	6.0 S.U.	9.0 S.U.	1/M	Grab
Total Suspended Solids (TSS)	1,3	30 mg/L	60 mg/L	NA	NA	1/M	Grab
Total Residual Chlorine	2,3	0.011 mg/L	0.011 mg/L	NA	NA	1/M	Grab

The basis for the limitations codes are:

1. Best Professional Judgement MGD = Million gallons per day.

1/M = Once every month in which a discharge occurs.

2. Water Quality Standards

NA = Not applicable.

3. 9VAC25-860 (VPDES General Permit for Potable Water Treatment Plants)

NL = No limit; monitor and report.

S.U. = Standard units.

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

5G/8H-C = 5 Grab/Eight Hour Composite - Consisting of five (5) grab samples collected at hourly intervals until the discharge ceases or five (5) grab samples taken at equal time intervals for the duration of the discharge if the discharge is less than eight (8) hours in length.

19c. Effluent Limitations/Monitoring Requirements: Outfall 902 (Emergency Storm Water Overflow)

Average flow is variable.

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS		DISCHARGE LIM	MONITORING REQUIREMENTS			
	LIMITS	Monthly Average	<u>Daily Maximum</u>	<u>Minimum</u>	<u>Maximum</u>	Frequency	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/Dis	Estimate
pH	1	NA	NA	NL	NL	1/Dis	Grab
Total Suspended Solids (TSS)	1	NA	NA	NA	NL	1/Dis	Grab
Total Residual Chlorine	1	NA	NA	NA	NL	1/Dis	Grab

The basis for the limitations codes are:

1. Best Professional Judgement MGD = Million gallons per day.

1/Dis = Once per discharge.

NA = Not applicable.

NL = No limit; monitor and report.

S.U. = Standard units.

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

20. Other Permit Requirements:

a) Part I.B. of the permit contains quantification levels and compliance reporting instructions.

9VAC25-31-190.L.4.c. requires an arithmetic mean for measurement averaging and 9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an in-stream excursion of water quality criteria. Specific analytical methodologies for toxics are listed in this permit section as well as quantification levels (QLs) necessary to demonstrate compliance with applicable permit limitations or for use in future evaluations to determine if the pollutant has reasonable potential to cause or contribute to a violation. Required averaging methodologies are also specified.

b) Permit Section Part I.C., details the requirements for Toxics Management Program.

The VPDES Permit Regulation at 9VAC25-31-210 requires monitoring and 9VAC25-31-220.I, requires limitations in the permit to provide for and assure compliance with all applicable requirements of the State Water Control Law and the Clean Water Act. A TMP is imposed for municipal facilities with a design rate >1.0 MGD, with an approved pretreatment program or required to develop a pretreatment program, or those determined by the Board based on effluent variability, compliance history, IWC, and receiving stream characteristics.

The Manassas Water Treatment Plant is an industrial discharger with an effluent that may be potentially toxic. It is staff's best professional judgement that the permittee continue to conduct annual acute testing during this permit term using *C. dubia* and *P. promelas* as the test species.

c) Permit Section Part I.D. details the requirements of a Storm Water Management Plan.
9VAC25-31-10 defines discharges of storm water from municipal treatment plants with design flow of 1.0
MGD or more, \r plants with approved pretreatment programs, or discharges of storm water associated with industrial activity. 9VAC25-31-120 requires a permit for these discharges. The Pollution Prevention Plan requirements are derived from the VPDES general permit for discharges of storm water associated with industrial activity, 9VAC25-151-10 et seq.

21. Other Special Conditions:

- O&M Manual Requirement. Required by Code of Virginia §62.1-44.19; Sewage Collection and Treatment Regulations, 9VAC25-790; VPDES Permit Regulation, 9VAC25-31-190.E. The permittee shall submit for approval an Operations and Maintenance (O&M) Manual or a statement confirming the accuracy and completeness of the current O&M Manual to the Department of Environmental Quality, Northern Regional Office (DEQ-NRO) no later than July 7, 2011. Future changes to the facility must be addressed by the submittal of a revised O&M Manual within 90 days of the changes. Non-compliance with the O&M Manual shall be deemed a violation of the permit.
- b) <u>Water Quality Criteria Reopener.</u> The VPDES Permit Regulation at 9VAC25-31-220 D. requires establishment of effluent limitations to ensure attainment/maintenance of receiving stream water quality criteria. Should effluent monitoring indicate the need for any water quality-based limitations, this permit may be modified or alternatively revoked and reissued to incorporate appropriate limitations.
- water Quality Criteria Monitoring. State Water Control Law §62.1-44.21 authorizes the Board to request information needed to determine the discharge's impact on State waters. States are required to review data on discharges to identify actual or potential toxicity problems, or the attainment of water quality goals, according to 40 CFR Part 131, Water Quality Standards, subpart 131.11. To ensure that water quality criteria are maintained, the permittee is required to analyze the facility's effluent resulting from a discharge from Outfall 002 for the substances noted in Attachment A of this VPDES permit. The data shall be submitted with the next application for reissuance, which is due at least 180 days prior to the expiration date of this permit.

- d) <u>Notification Levels.</u> The permittee shall notify the Department as soon as they know or have reason to believe:
 - a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) One hundred micrograms per liter;
 - (2) Two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter for antimony;
 - (3) Five times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.
 - b. That any activity has occurred or will occur which would result in any discharge, on a nonroutine or infrequent basis, of a toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (1) Five hundred micrograms per liter;
 - (2) One milligram per liter for antimony;
 - (3) Ten times the maximum concentration value reported for that pollutant in the permit application; or
 - (4) The level established by the Board.
- e) <u>Materials Handling/Storage</u>. 9VAC25-31-50 A prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia §62.1-44.16 and §62.1-44.17 authorize the Board to regulate the discharge of industrial waste or other waste.

<u>Permit Section Part II.</u> Part II of the permit contains standard conditions that appear in all VPDES Permits. In general, these standard conditions address the responsibilities of the permittee, reporting requirements, testing procedures and records retention.

23. Changes to the Permit from the Previously Issued Permit:

- a) Special Conditions:
 - 1. The tributyltin special condition was removed from the permit as monitoring is no longer warranted.
 - 2. The water quality criteria monitoring special condition was revised to reflect monitoring of Outfall 002 should a discharge take place during the term of the permit.
- b) Monitoring and Effluent Limitations:
 - 1. The monthly average TRC limitation of 0.016 mg/L and the daily maximum TRC limitation of 0.016 mg/L have both been revised to 0.011 mg/L in accordance with 9VAC25-860.
 - 2. Outfall 002 has been added the permit with this reissuance.
 - 3. Monitoring and effluent limitations have been added to the permit for Outfall 002.
 - 4. Outfall 902 has been added to the permit with this reissuance.
 - 5. Monitoring has been added to the permit for Outfall 902.
- 24. Variances/Alternate Limits or Conditions: N/A

25. Public Notice Information:

First Public Notice Date: March 7, 2011 Second Public Notice Date: March 14, 2011

Public Notice Information is required by 9VAC25-31-280 B. All pertinent information is on file and may be inspected, and copied by contacting the: DEQ Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193, Telephone No. (703) 583-3853, susan.mackert@deq.virginia.gov. See Attachment 9 for a copy of the public notice document.

Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address, and telephone number of the writer and of all persons represented by the commenter/requester, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit. Requests for public hearings shall state 1) the reason why a hearing is requested; 2) a brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit; and 3) specific references, where possible, to terms and conditions of the permit with suggested revisions. Following the comment period, the Board will make a determination regarding the proposed permit action. This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given. The public may request an electronic copy of the draft permit and fact sheet or review the draft permit and application at the DEQ Northern Regional Office by appointment.

26. 303 (d) Listed Stream Segments and Total Max. Daily Loads (TMDL):

The receiving stream, Broad Run, is listed on the current 303(d) list. The 2010 Virginia Water Quality Assessment 305(b)/303(d) Integrated Report (IR) gives an impaired classification for the following segment: VAN-A19R_BRU02A00. The Occoquan Streams Bacteria TMDL (*E. coli*) was approved by EPA November 15, 2006. The bacteria TMDL for the Occoquan Streams considered all upstream facilities. Because the Manassas Water Treatment Plant was not expected to discharge the contaminant of concern (*E. coli*) it did not receive a WLA in the TMDL.

<u>TMDL</u> Reopener: This special condition is to allow the permit to reopened if necessary to bring it in compliance with any applicable TMDL that may be developed and approved for the receiving stream.

27. Additional Comments:

Previous Board Action(s): None

Staff Comments: The facility has requested a reduction in toxicity monitoring from once per year to once every five years. The Manassas Water Treatment Plant is an industrial discharger with an effluent that may be potentially toxic. It is staff's best professional judgement that the permittee continue to conduct annual acute testing during this permit term using *C. dubia* and *P. promelas* as the test species.

Public Comment: No comments were received during the public notice.

EPA Checklist: The checklist can be found in Attachment 10.

Fact Sheet Attachments - Table of Contents

Manassas Water Treatment Plant VA0050181

2011 Reissuance

Attachment	Flow Frequency Determination
Attachment 2	NPDES Permit Rating Worksheet
Attachment 3	Facility Flow Diagram
Attachment 4	Topographic Map
Attachment 5	Waterbody Discharges
Attachment 6	Material Storage
Attachment 7	Site Visit Memorandum
Attachment 8	Wasteload Allocation Analysis – Limit Derivatio
Attachment 9	Public Notice
Attachment 10	EPA Checklist



DEPARTMENT OF ENVIRONMENTAL QUALITY Office of Water Quality Assessments

629 East Main Street

P.O. Box 10009

Richmond, Virginia 23219

SUBJECT: Flow Frequency Determination

Manassas WTP - #VA0050181

TO:

Cathy K. Malast, NRO

FROM:

Paul E. Herman, P.E., WOAP

DATE:

April 26, 2000

COPIES:

Ron Gregory, Charles Martin, File

Northern VA. Region Dept. of Env. Quality

This memo supersedes my April 20, 1995, memo to April Young concerning the subject VPDES permit.

The Manassas WTP discharges to the Broad Run near Gainesville, VA. Stream flow frequencies are required at this site for use by the permit writer in developing effluent limitations for the VPDES permit.

The VDEQ operated a continuous record gage on Broad Run at Buckland, VA (#01656500) from 1951 to 1986. The gage was located approximately 3.0 miles upstream of the discharge point at the U.S. Route 29 bridge in Prince William County. The flow frequencies for the gage and the discharge point are presented below. The values at the discharge point were determined by drainage area proportions and have been reduced by the volume of the Manassas WTP withdrawal from Lake Manassas. Adjustments have not been made for any minimum release requirements from the dam or for other upstream discharges, withdrawals, or springs.

Broad Run at Buckland, VA (#01656500):

Drainage Area = 50.5 mi^2

1Q10 = 0.68 cfs

High Flow 1Q10 = 5.0 cfs

7Q10 = 0.87 cfs

High Flow 7Q10 = 7.1 cfs

30Q5 = 2.1 cfs

HM = 9.4 cfs

The high flow months are December through April. The maximum withdrawal by the Manassas WTP from Lake Manassas during the high flow period occurred during April 1997, and equaled 225.553 million gallons (11.63 cfs). The maximum withdrawal during the low flow period occurred during August 1998, and equaled 312.356 million gallons (15.59 cfs). The flow frequencies for Broad Run at the Manassas WTP discharge point have been reduced by these withdrawal volumes.

Broad Run at Manassas WTP discharge point:

Drainage Area = 60 mi^2

1Q10 = 0.81 cfs - 15.59 cfs = 0.0 cfs

7Q10 = 1.0 cfs - 15.59 cfs = 0.0 cfs

30Q5 = 2.5 cfs - 15.59 cfs = 0.0 cfs

High Flow 1Q10 = 5.9 cfs - 11.63 cfs = 0.0 cfs

High Flow 7Q10 = 8.4 cfs - 11.63 cfs = 0.0 cfs

HM = 11.2 cfs - 15.59 cfs = 0.0 cfs

If you have any questions concerning this analysis, please let me know.

							X Regular Addition	_			
							Discretionary Addit				
VPI	DES NO. :	VA005	0181				Score change, but	no status Char	nge		
	Pr. N.	Managa	W/TD				Deletion				
	lity Name:		sas WTP	o / Drings Wil	liam Cauntu						
•	/ / County:		City of Manassas / Prince William County								
	ing Water:		Broad Run VAN-A19R								
vvale	erbody ID:	VAIN-A	191						-		
	ility a steam el ne following ch	•		=4911) with one		ermit for a mu on greater tha	nicipal separate storm se n 100,000?	wer serving a			
1. Power ou	utput 500 MW or	greater (no	t using a cooli	ing pond/lake)	YES;	score is 700	(stop here)				
2. A nuclear	r power Plant				X NO;	continue)					
Cooling v flow rater	water discharge	greater than	25% of the re	eceiving stream's 7	'Q10						
	score is 600 (s	ton here)	X NO: ((continue)							
163, 3	5006 13 000 (3	top riere)	X NO, ((continue)							
FACTO	R 1: Toxic	Pollutar	nt Potenti	ial							
PCS SIC (Code:		Primary	Sic Code: 49	41 (Other Sic Cod	es:				
Industrial	Subcategory C	Code: C	000	(Code (000 if no subcate	gory)					
Determeter			A				:	.1			
							ial column and check one		Deinte		
Toxicity No pro	•	ode Poi	nts	Toxicity Gro	•	Points	Toxicity Group	Code	Points		
	streams	0 ()	3.	3	15	X 7.	7	35		
1.		1 5	5	4.	4	20	8.	8	40		
		0 4	0		_	05		0	45		
2.	·	2 1	0	5.	5	25	9.	9	45		
				6.	6	30	10.	10	50		
							Code Number Ch	necked:	7		
							Total Points Fa	actor 1:	35		
									-		
FACTO	R 2: Flow/S	Stream F	Flow Volu	ime (Complete	either Section A	or Section B;	check only one)				
Section A	– Wastewater	· Flow Only	, considered	I	ç	Section B — W	astewater and Stream Fl	ow Considered	4		
	/astewater Typ					ater Type	Percent of Instream Was				
	ee Instruction		Cod		(see In	structions)	Receiving Str	eam Low Flow			
Type I:	Flow < 5 MG		11				F	Code	Points		
	Flow 5 to 10		12		Тур	e I/III:	< 10 %	41	0		
	Flow > 10 to		13				10 % to < 50 %	42	10		
	Flow > 50 M	GD	14	30			> 50%	43	20		
Type II:	Flow < 1 MG	D	21	10	Ту	pe II:	< 10 %	51	0		
	Flow 1 to 5 N	/IGD	22	20			10 % to < 50 %	52	20		
	Flow > 5 to 1	0 MGD	23	30			> 50 %	53	30		
	Flow > 10 M	GD	24	50							
Type III:	Flow < 1 MG	D	X 31	0							
A1	Flow 1 to 5 N		32								
	Flow > 5 to 1		33								
	Flow > 10 M		34								
							0 1 0:	=	<i>.</i> .		
							Code Checked from Se	_	31		
							Total Poir	nts Factor 2:	0		

FACTOR 3: Conventional Pollutants (only when limited by the permit) COD A. Oxygen Demanding Pollutants: (check one) BOD Other: Permit Limits: (check one) **Points** Code < 100 lbs/day 1 0 100 to 1000 lbs/day 2 5 > 1000 to 3000 lbs/day 15 3 > 3000 lbs/day 20 Code Number Checked: NA **Points Scored:** 0 B. Total Suspended Solids (TSS) Permit Limits: (check one) Code **Points** < 100 lbs/day 1 0 5 100 to 1000 lbs/day 2 > 1000 to 5000 lbs/day 15 3 > 5000 lbs/day 20 Code Number Checked: **Points Scored:** C. Nitrogen Pollutants: (check one) Ammonia Other: Permit Limits: (check one) Nitrogen Equivalent Code **Points** < 300 lbs/day 1 0 300 to 1000 lbs/day 2 5 > 1000 to 3000 lbs/day 15 3 > 3000 lbs/day 20 Code Number Checked: NA **Points Scored:** 0 **Total Points Factor 3:** 0 **FACTOR 4: Public Health Impact**

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this include any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above reference supply.

YES; (If yes, check toxicity potential number below)

NO; (If no, go to	o Factor 5	5)						
			from Appendix A. Use the n – check one below)	same SIC	doe and subc	ategory reference as in Fact	or 1. (Be s	ure to use
Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
No process waste streams	0	0	3.	3	0	X 7.	7	15
1.	1	0	4.	4	0	8.	8	20
2.	2	0	5.	5	5	9.	9	25
			6.	6	10	10.	10	30
						Code Number Che	cked:	7
						Total Points Fac	tor 4:	15

FACTOR 5: Water Quality Factors

A. Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-base federal effluent guidelines, or technology-base state effluent guidelines), or has a wasteload allocation been to the discharge

	Code	Points
X YES	1	10
□ NO	2	0

B. Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?

	Code	Points
X YES	1	0
NO	2	5

C. Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?

YES	Code 1	Points 10		
X NO	2	0		
Code Number Checked: Points Factor 5:	A 1 A 10	B 1 + B 0 +	C 1 =	10

FACTOR 6: Proximity to Near Coastal Waters

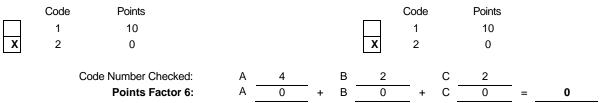
A. Base Score: Enter flow code here (from factor 2) _____31

Check a	ppropriate fa	acility HPRI code	(from PCS):	Enter the multiplication factor that co	rresponds to the flow code: 0.0
	HPRI#	Code	HPRI Score	Flow Code	Multiplication Factor
	1	1	20	11, 31, or 41	0.00
				12, 32, or 42	0.05
	2	2	0	13, 33, or 43	0.10
				14 or 34	0.15
	3	3	30	21 or 51	0.10
				22 or 52	0.30
X	4	4	0	23 or 53	0.60
				24	1.00
	5	5	20		
HP	RI code che	ecked: 4			
Base Sc	ore (HPRI S	Score): 0	Х (Multiplication Factor) 0.0 =	0

B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

C. Additional Points – Great Lakes Area of Concern For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 area's of concern (see instructions)?

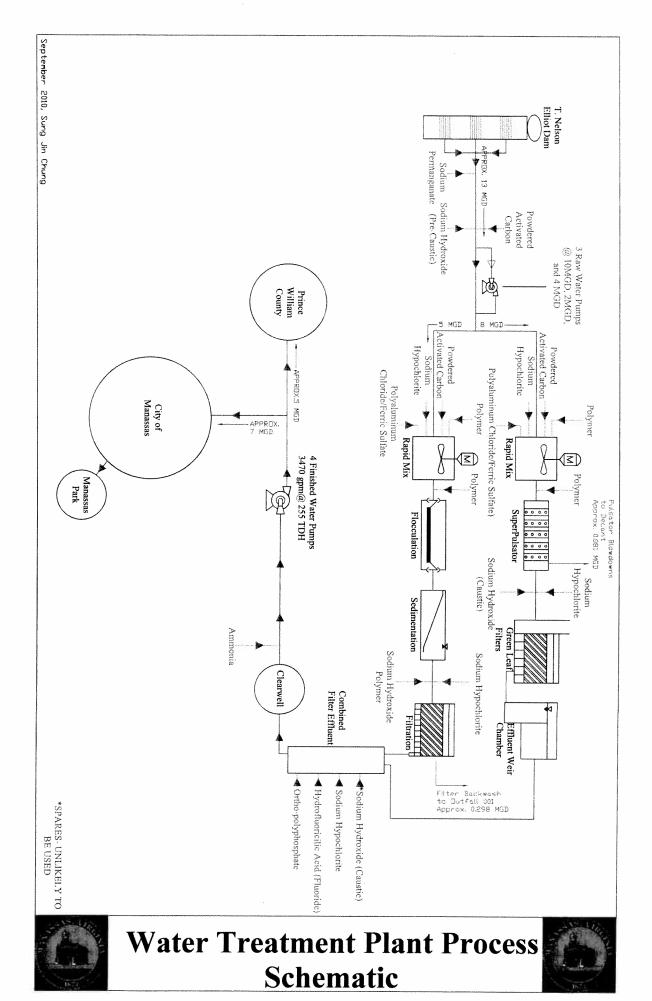


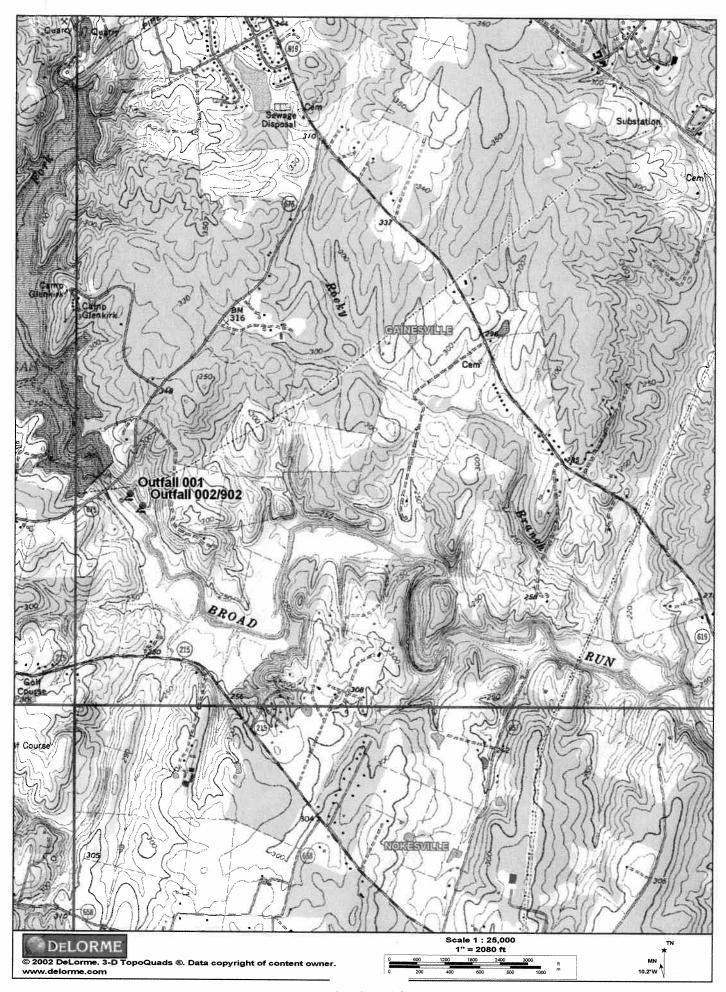
SCORE SUMMARY

<u>Fa</u>	<u>ctor</u>	<u>Description</u>	<u>Tota</u>	<u>ll Points</u>
	1	Toxic Pollutant Potential	;	35
2	2	Flows / Streamflow Volume		0
;	3	Conventional Pollutants		0
4	4	Public Health Impacts		15
	5	Water Quality Factors	•	10
(6 F	Proximity to Near Coastal Waters		0
		TOTAL (Factors 1 through 6)		60
S1. Is the total sco	ore equal to or grater than 80	YES; (Facility is a Ma	ajor) X	NO
X NO YES; (Add	d 500 points to the above sco	re and provide reason below		
NEW SCORE :	60			
OLD SCORE :	60			
				
		Perm	nit Reviewer's Name	: Susan Mackert
			Phone Number	(703) 583-3853

Phone Number: (703) 583-3853

Date: February 8, 2011





Attachment 4
Page 1 of 1

The facilities listed below either discharge to or are located within the waterbody VAN-A19R, and discharge to a receiving stream other than Broad Run or an unnamed tributary to Broad Run.

VA0020460	Vint Hill Farms Station WWTP (Kettle Run)
VA0085901	IBM Corporation (Cannon Branch)
VA0087700	Atlantic Research Corporation (Rocky Branch, UT)
VAG406009	Charles M. Carrington Residence (Lick Run)
VAG406040	Howard Wright Residence (Little Bull Run, UT)
VAG406065	Richard Katsaris Residence (Catharpin Creek, UT)
VAG406076	Michael W. Tinder, Sr. Residence (Catharpin Creek, UT)
VAG406134	Virginia Gateway Auto Plaza (South Run, UT)
VAG406162	Jackie L. Darne Residence (Chestnut Lick, UT)
VAG406165	Bobby Neal Residence (Little Bull Run, UT)
VAG406221	7-Eleven #20412 (Chestnut Lick, UT)
VAG406224	Gary Harris Residence (Little Bull Run)
VAG406233	PWCPS – Transportation Area (Kettle Run, UT)
VAG406236	John Gmitter Residence (Black Branch, UT)
VAG406247	Emery E. Childers Residence (Chestnut Lick, UT)
VAG406269	Teresa Robinson Residence (Cedar Run, UT)
VAG406270	Johanna Devon Residence (Chestnut Lick, UT)
VAG406271	Megan Judge Residence (Kettle Run)
VAG406292	Robert Glasgow Residence (Kettle Run, UT)
VAG406333	David Rupp Residence (Kettle Run, UT)
VAG406420	Veronica Gaona Residence (Kettle Run, UT)
VAG406427	Richard Wallace Residence (Slate Run, UT)
VAG406431	Constance Capone Residence (Kettle Run, UT)
VAG406447	Brian Sandberg Residence (Kettle Run, UT)
VAG406472	Stephen Elmore Residence (Kettle Run, UT)
VAG750167	Suds of Gainesville, LLC (Rocky Branch)
VAG840075	Glen Gery Corporation (Cannon Branch, UT)
VAG840092	Vulcan Construction Materials - Manassas (Cannon Branch, UT)
VAG110312	Betco Supreme Incorporated (Dawkins Branch)
VAR050859	Glen Gery Corporation - Manassas Quarry (Cannon Branch, UT)
VAR050901	Superior Paving Corporation – Manassas Plant (Cannon Branch)
VAR050907	Micron Technology Incorporated (Cannon Branch, UT)
VAR050908	Branscome Paving Company - Manassas (Dawkins Branch, UT)

VAR050985	Manassas Regional Airport (Cannon Branch)
VAR051030	UPS Freight - Bristow (Rocky Branch, UT)
VAR051043	Lockheed Martin - Manassas (Cannon Branch, UT)
VAR051094	Norfolk Southern Railway – Manassas Yard (Cannon Branch, UT)
VAR051117	Alliant Atlantic Food Service (Dawkins Branch, UT)
VAR051294	FedEx Freight East Incorporated (Cannon Branch)
VAR051298	Sam's Junk Recycle Scrap and Materials Services (North Fork)
VAR051526	Flightworks Incorporated (Cannon Branch)
VAR051646	FedEx National LTL Incorporated (Cannon Branch, UT)
VAR051911	Asphalt Emulsion Incorporated (Cannon Branch, UT)
VAR051919	Chantilly Air (Cannon Branch)

DESCRIPTION OF SIGNIFICANT MATERIALS FORM 2F, SECTION IVB MANASSAS WATER TREATMENT PLANT

Storm water drains located throughout the property all lead to the storm water management basin located on the southeastern corner of the property. This system discharges storm water through a valved conveyance, currently identified as Outfall 002. This outfall discharges to Broad Run located east of the property beyond the property line.

Activities that are exposed to storm water include: tank fueling operations, container and material storage, and chemical unloading areas. All other activities and storage containers are located inside and do not pose a risk to storm water. This facility has no storm water discharges to any municipal conveyances. There is no discharge of floating solids or visible foam in other than trace amounts.

Material	Container	Location	BMP
Diesel	5,000 gallon tank	East of Clearwell	On concrete, double-walled
Ammonia	8,000 gallon tank	South of the Clarifier Building	Outdoors, on concrete pad, bermed
Hypofluosilicic Acid	6,000 gallon tank	South of the Clarifier Building	Outdoors, on concrete, bermed
Sodium Hypochlorite	10,000 gallon tank	East of Filter Building	Outdoors, on concrete, bermed
Sodium Hypochlorite Ferric Sulfate	Loading/Unloading ports	Eastside of Filter/Clarifier Building	Concrete spill basin located below the fill port
Caustic Soda	Loading/Unloading ports Loading/Unloading	Eastside of Chemical Storage Building	Concrete spill basin located below the fill port
Sodium	ports Loading/Unloading Loading/Unloading	Eastside of Chemical Storage Building	Concrete spill basin located below the fill port
Permanganate* Polyaluminum	ports	Eastside of Chemical Storage Building	Concrete spill basin located below the fill port
Chloride	Loading/Unloading ports	Eastside of Chemical Storage Building	Concrete spill basin located below the fill port
Phosphate	50 pound bags	Pulsator Building dock	Wrapped in cellophane on pallets (spill kit available)
Polymer	50 pound bags	Unloading dock near Operator Building	Wrapped in cellophane on pallets
Earthtec	275 gallon totes	Unloading dock near Operator Building	(spill kit available) Storm drain covered while
Carbon	200,000 dry tons in silo	South of Chemical Storage Building	unloading (spill kit available) Temporary storm drain cover

^{*}Will be used on site by the end of 2011

MEMORANDUM

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY NORTHERN REGIONAL OFFICE

13901 Crown Court

Woodbridge, VA 22193

SUBJECT: Manassas Water Treatment Plant (VA0050181)

TO: Reissuance File

FROM: Susan Mackert

DATE: September 30, 2010

A site visit was conducted on September 16, 2010, in support of the permit reissuance for the aforementioned facility. Application packages were received on October 5, 2010, and November 2, 2010, and the site visit confirms that the applications received are accurate and representative of actual site conditions.

No changes were noted with respect to Outfall 001 (photos 1-3). This outfall remains the primary discharge point from the facility for industrial wastewater. Discharge is intermittent in nature occurring three times per week for four hours at a time.

With this reissuance, Outfall 002 has been added to the permit and designated as an industrial wastewater / comingled storm water overflow. Under typical conditions this outfall does not discharge. However, there are industrial processes within the drainage area of the outfall (photos 4-5). Should there be an operational problem and/or failure within the drainage area industrial process water would flow to the retention pond (photo 6) and overflow towards Broad Run (photos 7-8). As such, there is reasonable potential for an industrial wastewater and/or co-mingled storm water discharge from the retention pond.

A discrete storm water discharge would only occur when the retention pond overflows (photos 6-8) due to a significant rain event. With this reissuance, Outfall 902 has been added to the permit and designated as an emergency storm water overflow.



Photo 1. Outfall 001.



Photo 2. Upstream of Outfall 001.



Photo 3. Downstream of Outfall 001.

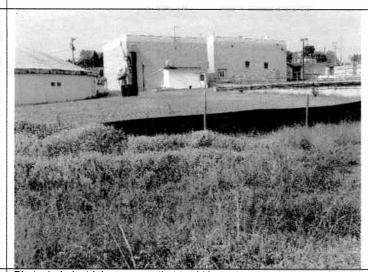


Photo 4. Industrial processes that could impact storm water retention pond shown in Photo 6.

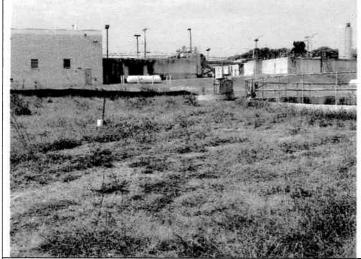


Photo 5. Industrial processes that could impact storm water retention pond shown in Photo 6.



Photo 6. Storm water retention pond.



Photo 7. Overflow location of storm water retention pond shown in Photo 6.

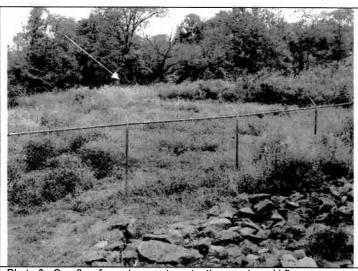


Photo 8. Overflow from storm water retention pond would flow across grassy area shown in photo and enter Broad Run. The arrow indicates the location of Broad Run.

Attachment 8 Page 1 of 9

FRESHWATER WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: Manassas WTP

Receiving Stream:

Broad Run

Permit No.: VA0050181

Early Life Stages Present Y/N? = Public Water Supply (PWS) Y/N? = 10% Maximum pH = 90% Maximum pH = 90% Temperature (Wet season) = Trout Present Y/N? = Tier Designation (1 or 2) = 90% Temperature (Annual) = Mean Hardness (as CaCO3) = Stream Information 23.9 deg C 76 mg/L < 3 3 4 8 SU deg C SU Stream Flows

Harmonic Mean =	30Q5 =	30Q10 (Wet season)	1Q10 (Wet season) =	30Q10 (Annual) =	7Q10 (Annual) =	1Q10 (Annual) =
0 MGD	0 MGD	0 MGD	0 MGD	0 MGD	0 MGD	0 MGD

	- 30Q10 Mix =	Wet Season - 1Q10 Mix =	- 30Q10 Mix =	- 7Q10 Mix =	Annual - 1Q10 Mix =
	100 %	100 %	100 %	100 %	100 %

Mixing Information

Effluent Information	
Mean Hardness (as CaCO3) =	50 mg/L
90% Temp (Annual) =	25 deg C
90% Temp (Wet season) =	deg C
90% Maximum pH =	7.14 SU
10% Maximum pH =	SU
Discharge Flow =	1 MGD

Version: OWP Guidance Memo 00-2011 (8/24/00)

Parameter	Background		Water Quality Criteria	/ Criteria			Wasteload Allocations	Hocations		A	Antidegradation Baseline	n Baseline		Ant	degradation	Antidegradation Allocations			Most Limiting Allocations	Allocations	
(ug/l unless noted)	Conc.	Acute	Chronic H	HH (PWS)	壬	Acute	Chronic HH (PWS)	H (PWS)	₹	Acute	Chronic HH (PWS)	H (PWS)	Ŧ	Acute	Chronic HH (PWS)	H (PWS)	Ξ	Acute	Chronic	HH (PWS)	∄
Acenapthene	0	1	1	na	9.9E+02	1	1	na	9.9E+02	1	ı	1	-	-	:	:	1	1		na	9.9E+02
Acrolein	0	ŀ	ı	na	9.3E+00	i	1	na	9.3E+00	1	1	1	1	1	ı	;	1	ı	í	na	9.3E+00
Acrylonitrile ^C	0	1	ı	na	2.5E+00	i	1	na	2.5E+00	1	1	1	1	1	1	:	1	í	1	na	2.5E+00
Aldrin ^c	0	3.0E+00	;	na	5.0E-04	3.0E+00	ı	na	5.0E-04	1	1	1	ı	ŧ	1	1	1	3.0E+00	I	na	5.0E-04
(Yearly)	0	3.15E+01	2.83E+00	굷	1	3.2E+01	2,8E+00	na	1	ı	î	ł	!	1	1	1	1	3.2E+01	2.8E+00	n a	1
Ammonia-N (mg/l)																		1		i	
(High Flow)	0	3.15E+01	5.56E+00	na	1	3.2E+01	5.6E+00	na	1	i	1	1	1	ı	1	ı	1	3.2E+01	5.6E+00	na	ı
Anthracene	0	1	1	na	4.0E+04	i	1	na	4.0E+04	1	ŧ	1	1	1	1	1	1	ı	1	na	4.0E+04
Antimony	0	ı	ı	na	6.4E+02	ı	1	na	6.4E+02	ł	;	i	1	1	1	:	1	í	1	na	6.4E+02
Arsenic	0	3.4E+02	1.5E+02	na	1	3.4E+02	1.5E+02	na	:	;	1	1	1	1	1	1	1	3.4E+02	1.5E+02	78	í
Barium	0	i	ı	na	1	1	1	na	1	i	ı	1	1	ı	1	i	1	1	ı	78	ſ
Benzene ^C	0	;	ı	na	5.1E+02	i	1	na	5.1E+02	1	ļ	i	1	1	1	1	1	1	1	na	5.1E+02
Benzidine ^C	0	1	1	na	2.0E-03	i	1	na	2,0€-03	ı	ı	ı	ı	1	1	1	1	ı	1	na	2.0€-03
Benzo (a) anthracene ^c	0	ı	1	na a	1.8E-01	i	!	na	1.8E-01	1	1	i	1	1	1	į	1	ı	ı	na	1.8E-01
Benzo (b) fluoranthene ^C	0	;	1	na	1.8E-01	ı	ı	na	1.8E-01	1	f	ļ	!	I	;	1	1	ı	ı	na	1.8E-01
Benzo (k) fluoranthene ^C	0	ł	1	na	1.8E-01	1	1	na	1.8E-01	1	ı	1	1	1	ı	ı	1	1	í	na	1.8E-01
Benzo (a) pyrene ^C	0	;	;	na	1.8E-01	I	ı	na	1.8E-01	1	1	1	1	1	ı	ı	1	t	ı	na	1.8E-01
Bis2-Chloroethyl Ether C	٥	1	1	na	5.3E+00	;	i	na	5.3E+00	1	1	1	1	i	ı	;	ı	ı	1	na	5.3E+00
Bis2-Chloroisopropyl Ether	0	ı	í	na	6.5E+04	1	1	na	6.5E+04	1	1	1	1	i	1	:	1	1	1	па	6.5E+04
Bis 2-Ethylhexyl Phthalate ^C	0	ı	i	na	2.2E+01	1	1	na	2.2E+01	1	1	1	1	;	ı	1	1	ı	ı	na	2.2E+01
Bromoform ^C	0	1	i	na	1.4E+03	1	1	na	1.4E+03	ŧ	f	1	1	;	1	1	1	i	ſ	na	1.4E+03
Butylbenzylphthalate	0	1	i	na	1.9E+03	1	1	na	1.9E+03	1	1	ı	:	i	1	1	;	1	ı	na	1.9E+03
Cadmium	0	1.8E+00	6.6E-01	na	1	1.8E+00	6.6E-01	na	1	1	1	1	1	ı	1	1	1	1.8E+00	6.6E-01	na	ı
Carbon Tetrachloride ^C	0	ı	1	na	1.6E+01	;	1	na	1.6E+01	1	1	1	1	ı	ı	i	1	1	1	na	1.6E+01
Chlordane ^C	0	2.4E+00	4.3E-03	na	8.1E-03	2.4E+00	4.3E-03	na	8.1E-03	;	1	1	-	1	1	i	!	2.4E+00	4.3E-03	na	8.1E-03
Chloride	0	8.6E+05	2.3E+05	na	1	8.6E+05	2.3E+05	na	ı	ı	1	1	-	1	i	1	:	8.6E+05	2.3E+05	na	1
TRC	0	1.9E+01	1.1E+01	na	1	1.9E+01	1.1E+01	na	1	ı	ł	ı	1	1	i	1	!	1.9E+01	1.1E+01	na	ı
Chlorobenzene	0	-	-	na	1.6E+03	-	-	na	1.6E+03	1	1	1	-	-	-	1	Ŀ	1	ı	na	1.6E+03

Parameter	Background		Water Quality Criteria	ty Criteria		er.	Wasteload Allocations	llocations			Antidegradat	Antidegradation Baseline		Ą	ntidegradatio	Antidegradation Allocations			Most Limitin	Most Limiting Altocations	
(ug/i unless noted)	Conc.	Acute	Chronic HH (PWS)	HH (PWS)	Ŧ	Acute	Chronic H	HH (PWS)	₹	Acute	Chronic	HH (PWS)	₹	Acute	Chronic	Chronic HH (PWS)	Ŧ	Acute	Chronic	HH (PWS)	王
Chlorodibromomethane ^C	0	:	:	na	1.3E+02	:	:		1.3E+02	;	ı	ı	,	ı	:	ŀ	:	ı	ı	na	1.3E+02
Chloroform	0	:	:	na	1.1E+04	:	1	na	1.1E+04	:	ŀ	1	1	ŧ	ı	ŀ	:	1	ı	na	1.1E+04
2-Chloronaphthalene	0	:	:	na	1.6E+03	:	:	na	1.6E+03	:	ŀ	:	:	:	:	:	:	ı	ı	na	1.6E+03
2-Chlorophenol	0	ı	:	na	1.5E+02	:	:	na	1.5E+02	:	:	:	ŧ	:	ŧ	:	:	1	ı	na	1.5E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	!	8.3E-02	4.1E-02	na	1	1	:	1	1		:	ı	1	8.3E-02	4.1E-02	na	ı
Chromium III	0	3.2E+02	4.2E+01	na	:		4.2E+01	na	;	1	:	:	!	:	:	:	:	3.2E+02	4.2E+01	na	
Chromium VI	0	1.6E+01	1.1E+01	na	ı	1.6E+01	1.1E+01	na	1	1	ł	ı	1		1	1	:	1.6E+01	1.1€+01	na	1
Chromium, Total	0	:	:	1.0E+02	!	:	ı	na	1	:	ı	:	1	ſ	1	ł	1	1	ı	na	
Chrysene ^c	0	;	ŀ	na	1.8E-02	ı	ŀ	na	1.8E-02	ŀ	ŀ	;	:	:	ı	ı	:	1	1	na	1.8E-02
Capper	0	7.0E+00	5.0E+00	na	;	7.0E+00	5.0E+00	na	:	ŧ	ŧ	:	:	ŀ	ı	ł	!	7.0E+00	5.0E+00	na	t
Cyanide, Free	0	2.2E+01	5.2E+00	na	1.6E+04	2.2E+01	5.2E+00	na	1.6E+04	ŧ	:	:	:	;	:	ŧ	:	2.2E+01	5.2E+00	na	1.6E+04
DDD C	0	:	:	na	3.1E-03	1	t	na	3.1E-03	1	;	:	:	í	:	ı	1	ι	1	na	3.1E-03
DDE °	0	;	:	na	2.2E-03	:	;	na	2.2E-03	:	;	:	:	:	;	ı	1	1	t	na	2.2E-03
DOT°	0	1.1E+00	1.0E-03	na	2.2E-03	1.1E+00	1.0E-03	na	2.2E-03	1	:	1	1	:	1	ţ	1	1.1E+00	1.0E-03	na	2.2E-03
Demeton	0	:	1.0E-01	na	ı	1	1.0E-01	na	1	1	:	1	:	ı	t	ŧ	1	1	1.0E-01	na	ı
Diazinon	0	1.7E-01	1.7E-01	na	1	1.7E-01	1.7E-01	na	:	;	ı	:	1	ı	:	;	:	1.7E-01	1.7E-01	na	1
Dibenz(a,h)anthracene ^C	0	:	1	na	1.8E-01	:	ı	na	1.8E-01	ı	ŀ	١	:	ı	ı	ı	!	ı	ı	na	1.8E-01
1,2-Dichlorobenzene	0	:	ı	na	1.3E+03	:	:	na	1.3E+03	;	;	ı	!	ı	ı	ı	1	i	ı	na	1.3E+03
1,3-Dichlorobenzene	0	,	:	na	9.6E+02	;	:	na	9.6E+02	:	:	1	:	ı	:	:	:	ı	ı	na	9.6E+02
1,4-Dichlorobenzene	0	:	:	na	1.9E+02	;	:	na	1.9E+02	:	:	;	;	ı	;	:	ŀ	ı	I	na	1.9E+02
3,3-Dichlorobenzidine ^C	0	:	:	na	2.8E-01	:	1	na	2.8E-01	;	:	1	:	:	;	ŧ	:	1	ı	na	2.8E-01
Dichlorobromomethane ^C	0	:	1	na	1.7E+02	;	:	na	1.7E+02	ı	;	1	:	ı	1	ı	1	ı	ı	na	1.7E+02
, Z-Dichloroemane	, c	:	;	ä	3./11402	١	;	i a	3./11+02	:	١	,	1	;	:	:		1	ı	128	3./6+02
3.trans-dichloroathulana			: 1	<u>a</u>	1 0=104	: :	۱ ۱	2 2	1.1E+03	: :	: :	: :		! !	: :	: :	· ·	1 1	1 1	า ก	1 05-03
2.4-Dichlorophenol	0 0	:	ŀ	na i	2.9E+02	:	ı	na :	2.9E+02	:	:	:	:	ı	;	ŀ	!	ı	ı	2 1	2.9€+02
2,4-Dichlorophenoxy	,			3	!		:	8		}	ŧ	:	1	l				t		3	
acetic acid (2,4-D) 1,2-Dichloropropane ^C	0 (:	ı	na i	1.5E+02	:	:	ᆲ	1.5E+02	:	:	:	:	ı	ŧ	ŀ	ı	ı	ı	na i	1.5E+02
1,3-Dichloropropene ^C	0	:	;	na	2.1E+02	:	:	na	2.1E+02	:	ı	:	:	:	:	t	:	1	t	na	2.1E+02
Dieldrin ^C	0	2.4E-01	5.6E-02	na	5.4E-04	2,4E-01	5.6E-02	na	5.4E-04	ŀ	ı	:	1	1	;	1	;	2.4E-01	5.6E-02	na	5.4E-04
Diethyl Phthalate	0	:	i	na	4.4E+04	1	:	na	4.4E+04	;	ı	;	:	:	ı	;	1	ı	ı	na	4.4E+04
2,4-Dimethylphenol	0	١	t	na	8.5E+02	:	:	na	8.5E+02	:	:	;	:	:	;	ı	:	1	ı	na	8.5E+02
Dimethyl Phthalate	0	;	i	na	1.1E+06	:	:	na	1.1E+06	:	:	1	:	:	ı	:	:	ı	1	na	1.1E+06
Di-n-Butyl Phthalate	0	;	:	na	4.5E+03	:	:	na	4.5E+03	:	:	:	;	:	ı	:	1	ı	ı	na	4.5E+03
2,4 Dinitrophenol	0	:	:	na	5.3E+03	1	1	na	5.3E+03	;	:	:	:	:	;	;	:	1	1	na	5.3E+03
2-Methyl-4,6-Dinitrophenol	0	:	;	na	2,8E+02	:	:	na	2.8E+02	ı	;	٠	:	ı	ı	ŀ	!	1	ı	na	2.8E+02
2,4-Dinitrotoluene ^c Dioxin 2,3,7,8-	0	:	:	na	3.4E+01	:	!	na	3.4E+01	:	:	:	ı	:	;	ţ	1	ı	t	na	3.4E+01
tetrachlorodibenzo-p-dioxin	0	:	:	na	5.1E-08	:	1	na	5.1E-08	:	ı	:	1	ı	:	;	1	ı	ı	na	5.1E-08
1,2-Diphenylhydrazine ^C	0	1	:	na	2.0E+00	:	;	na	2.0E+00	:	1	1	ı	ı	ı	:	,	ı	1	na	2.0E+00
Alpha-Endosultan	0	2.2E-01	5.6E-02	na	8.9E+01		5.6E-02	na	8.9E+01	:	ŧ	:	:	:	ı	1	1	2.2E-01	5.6E-02	na	8.9E+01
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01		5.6E-02	na	8.9E+01	:	:	ı	!	ı	:	ž	!	2.2E-01	5.6E-02	na	8.9E+01
Alpha + Beta Endosulfan	0	2.2E-01	5.6E-02	: :	;	2.2E-01	5.6E-02		1 :	:	ı	:	:	:	:	}	;	2.2E-01	5.6E-02	1	9 1
Endosulan Sulate		8 FF 100	3 6E-00	2 2	6.05.00	8 RF-03	3 6E-00		8 OF -02	1 1	: :			: :	1	: :	: :	8 6 1	3 SE-00	3 8	6.9E-02
Endrin Aldebude	> 0	1 0		3 5	3.05-01				3 05 05	!	:	:			:	:		1 0	1 1	3 8	ء د 2 و
Circles Addenied	4				0.01			ŀ	0.01								_				1

Parameter	Background		Water Quality Criteria	ity Criteria			Wasteload	Wasteload Allocations	s		Antidegrad	Antidegradation Baseline	ne		ntidegrada	Antidegradation Allocations	ns		Most Limit	Most Limiting Allocations	ร
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	Ŧ	Acute	Chronic	HH (PWS)	Ŧ	Acute	Chronic	Chronic HH (PWS)	¥	Acute	Chronic	Chronic HH (PWS)	Ŧ	Acute	Chronic	HH (PWS)	₹
Ethylbenzene	0	;	ł	na	2.1E+03	ı	ı	na	2.1E+03	1	1	;	1	ı	1	ı	ı	ı	ı	na	2.1E+03
Fluoranthene	.0	÷	1	na	1.4E+02	1	1	na	1.4E+02	1	ı	1	1	;	ı	ı	,	ı	ı	na	1.4E+02
Fluorene	· 0	ı	ı	a	5.3E+03	1	1	na	5.3E+03	,	1	1	i	1	ŀ	ì	ı	ı	ı	na	5.3E+03
Cuthian	, 0	I	1 :	: a	1	1	? !	a	ı	;	1	1	i	1	ı	*	ı	1	ı	na	ı
Heptachior ^C	5 C	5.2E-01	3.8E-03	2 2	7.9E-04	5.2E-01	3.85-03	n n	7.9F-04		1 1	1 1		1			ì	n N	1.0E-02	: 23	7 1
Heptachlor Epoxide ^C	0 1	5.2E-01	3.8E-03	2 1	3.95-04	52E-01	3.8F-03	2 2	3 95-04	!	1	:	1 1			: 1		n oik	3 00 00	3 8	- OF OF
Hexachlorobenzene ^C	0	ı	1	na i	2.9€-03	1	;	Pa ;	2.9E-03	1	i	:	ŧ	1	ı	ı	1 :		1 1	2 8	3 0 5 0 5
Hexachlorobutadiene ^C	0	ł	1	na	1.8E+02	:	ı	na	1.8E+02	,	1	;	1	1	ı	i	1	ı	ı	2 :	1.8E+02
Hexachlorocyclohexane					,				į											ī	1.0
Alpha-BHC ^C	0	ı	1	na	4.9E-02	1	ı	na	4.9E-02	1	:	:	1	1	;	1	1	ı	ı	na	4.9E-02
Beta-BHC ^C	0	1	!	n a	1.7E-01	1	:	n a	1.7E-01	:	1	i	1	1	ī	:	ı	I	ı	3	1 75-01
Hexachlorocyclohexane																				i	
Gairilla-DHC (Linualie)	ć	9.56-01	ā	na	1.8E+00	9.55-03	:	na	1.85+00	;	;	ì	1	1	1	1	;	9.5E-01	ı	na	1.8E+0
Hexachlorocyclopeniaciene	, p	1	1	: ⊋	1.1E+03	1	ı	na	1.1E+03	1	1	1	I	1	i	1	ï	ı	ı	na	1.1E+03
riexaciiioi oeii giie	, ,	i	1 1	i ia	3.35+01	1	1	na	3.3E+01	1	;	1	,	:	1	1	1	ı	1	na	3.3E+01
Hydrogen Suitide	, ,	1	2.0E+00	<u></u>	1 1	1	2.0E+00	na	? ?	1	;	ı	1	ļ	ŧ	ì	1	ı	2.0E+00	na	1
Trop	> 0		1 1	3 5	, 0		. 1	3 5	1.00-01	1	,	;	1	;	1	ı	;	ı	ı	na	1.8E-01
lsophorone ^C	0 (1	ł	a :	9.6E+03	1	1	a a	9.6E+03		1 1	1 1	ı :	1 1	1 1	ı ;	: :	l i	1 1	2 2	0 85-103
Kepone	0	1	0.0E+00	na	1	ı	0.0€+00	na	ı	;	1	1	i	1	ı	:	1	1	0.0E+00	กล	ı
Lead	0	4.9E+01	5.6E+00	na	1	4.9E+01	5.6E+00	na	ı	1	1	1	1	1	1	:	‡	4.9E+01	5.6E+00	na	ı
Malathion	0	1	1.0E-01	na	:	1	1.0E-01	na	1	:	1	1	ı	ı	ı	Ī	ı	ı	1.0E-01	na a	1
Manganese	0	1	1	na	1	1	1	na	;	1	1	1	1	1	t	ı	;	1	ı	na	ı
Mercury	0	1.4E+00	7.7E-01	:	:	1.4E+00	7.7E-01	;	;	ı	1	1	ı	;	i	ı	:	1.4E+00	7.7E-01	;	;
Methyl Bromide	0	į	i	na	1.5E+03	1	1	na	1.5E+03	1	1	1	ı	ı	1	ı	1	ı	ı	na	1.5E+03
Methylene Chloride	0	1	ı	na	5.9E+03	1	1	na	5.9E+03	1	ŧ	;	;	1	1	;	1	ı	ı	na	5.9E+03
Methoxychlor	. 0	1	3.0E-02	na	1	1	3.0E-02	na	1	,	ı	1	1	1	ı	1	1	ı	3.0E-02	na	ı
Wilex	, ,	1	0.05+00	ä	; ;	,	0.01	na	,	ţ	;	ı	1	1	ı	;	ł	ı	0.0E+00	na	ı
Nickel	· c	1.0E+02	1.1E+01	na R	4.6E+03	1.0E+02	1.1E+01	, n	4.6E+03	1	ł	1	1	ı	1	ı	ı	1.0E+02	1.1E+01	na	4.6E+03
Nitrobenzene	0	1	1	na	6.9E+02	1	ı	n a	6.9E+02	ı	;	1	i	i	ı	ı	ı	ı	ı	3 8	500
N-Nitrosodimethylamine ^C	0	ı	1	na	3.0E+01	1	1	na	3.0E+01	ı	ı	1	:	1	ŀ	1	ı	ı	ı	2 1	3.0E+01
N-Nitrosodiphenylamine ^C	0	ı	ł	na	6.0E+01	1	1	na	6.0E+01		;	1	1	ı	1	ı	ì	ı	ı	na	6.0E+01
N-Nitrosodi-n-propylamine ^C	0	ı	1	na	5.1E+00	1	1	na	5.1E+00	1	ŧ	ı	ı	ı	ı	ŧ	1	1	ı	na	5.1E+00
Nonylphenol	0	2.8E+01	6.6E+00	t	:	2.8E+01	6.6E+00	na	:	1	i	ı	1	1	ı	1	ı	2.8E+01	6.6E+00	na	ı
Parathion	0	6.5E-02	1.3E-02	na	1	6.5E-02	1.3E-02	na	;	i	i	;	1	1	ı	ı	;	6.5E-02	1.3E-02	2	ı
PCB Total	0	1	1.4E-02	na	6.4E-04	í	1.4E-02	na	6,4E-04	1	ı	t	1	1	1	;	1	ı	1.4E-02	na	6.4E-04
Pentachlorophenol `		7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01	1	1	;	1	1	1	ı	1	7.7E-03	5.9E-03	na	3.0€+01
Phenol	0	ı	;	na	8.6E+05	ı	ı	na	8.6E+05	1	1	ı	ı	ì	1	1	1	1	i	na	8.6E+05
Pyrene	0	1	1	na	4.0E+03	1	;	na	4.0E+03	1	ı	t	ı	1	;	1	1	1	ı	กล	4.0E+03
Radionuclides Gross Alpha Activity	0	ŀ	!	na	ı	1	;	na	1	ı	1	ı	1	1	;	;	1	ı	ı	na	ı
(pCVL)	0	;			1			na	1	1	ı		1	ı	1	1	1	ı	ı	na	ı
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Radium 226 + 228 (pCi/L)	0 0	1 1	1 1 1	na na	4.0E+00	1 1 1	1 1 1	na na	4.0E+00	1 1	1 1	: : :	1 1	1 1	1 1	1	i :	1 1	l I	n na	4.0E+00

Parameter	Background		Water Quality Criteria	ty Criteria			Wasteload Allocations	Allocations		A	ntidegradat	Antidegradation Baseline		An	tidegradatio	Antidegradation Allocations			Most Limit	Most Limiting Allocations	8
(ug/l unless noted)	Conc.	Acute	Chronic HH (PWS)	HH (PWS)	Ŧ	Acute	Chronic HH (PWS)	±H (PWS)	壬	Acute	Chronic HH (PWS)	HH (PWS)	Ξ	Acute	Chronic	Chronic HH (PWS)	Ŧ	Acute	Chronic	HH (PWS)	
Selenium, Total Recoverable	0	2.0E+01	5.0E+00	na	4.2E+03	2.0E+01	5.0E+00	na	4.2E+03		;	ı	1	1	;	į	;	2.0E+01	5.0E+00	na	4.2E+03
Silver	0	1.0E+00	;	na	;	1.0E+00	;	na	1	;	;	ł	!	;	ł	;	;	1.0E+00	f	28	ı
Sulfate	0	;	ŧ	na	1	1	1	na	1	1	;	1	;	1	ı	f	;	ı	ı	na	ı
1,1,2,2-Tetrachloroethane ^C	0	1	ŧ	na	4.0E+01	ŧ	1	กล	4.0E+01	ı	;	;	;	ī	1	1	;	ı	ı	na	4.0E+01
Tetrachloroethylene ^C	0	1	1	na	3.3E+01	;	ŧ	na	3.3E+01	1	:	1	;	;	1	;	1	1	ı	2	3.3E+01
Thallium	0	1	ì	na	4.7E-01	ı	1	na	4.7E-01	1	1	1	1	1	ı	1	1	i	ı	na	4.7E-01
Toluene	0	1	;	na	6.0E+03	;	;	na	6.0E+03	1	1	t	1	1	t	ı	1	i	1	na	6.0E+03
Total dissolved solids	0	1	ı	na	1	1	1	na	1	1	;	1	1	1	1	ŀ	5	ı	1	na	ı
Toxaphene ^C	0	7.3E-01	2.0E-04	na	2.8E-03	7.3E-01	2.0E-04	na	2.8E-03	;	ı	1	1	1	ı	i	ı	7.3E-01	2.0E-04	na	2.8E-03
TributyItin	0	4.6E-01	7.2E-02	na	1	4.6E-01	7.2E-02	na	}	1	ı	;	1	1	;	;	1	4.6E-01	7.2E-02	na	I
1,2,4-Trichlarabenzene	o	ţ	i	na	7.0E+01	i	1	na	7.0E+01	1	i	1	;	1	1	1	ı	f	ı	na	7.0E+01
1,1,2-Trichloroethane ^C	0	1	1	na	1.6E+02	1	1	ಣ	1.6E+02	1	3	1	1	1	3	;	ı	1	ı	na	1.6E+02
Trichloroethylene ^C	0	ı	1	na	3.0E+02	1	\$	na	3.0E+02	ł	i	;	1	;	1	1	;	ı	t	na	3.0€+02
2,4,6-Trichlorophenol ^C	0	ı	;	na	2.4E+01	1	:	na	2.4€+01	ţ	ŀ	:	1	1	1	1	;	t	ı	na	2.4E+01
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	ŧ	ı	na	1	į	1	na	:	1	ı	;	1	ŧ	;	1	1	i	t	na	ı
Vinyl Chloride ^C	٥	ı	;	na	2.4E+01	ţ	1	na	2.4E+01	1	;	;	;	1	1	:	1	1	ı	na	2.4E+01
Zinc	0	6.5E+01	6.6E+01	na	2.6E+04	6.5E+01	6.6E+01	na	2.6E+04	,	,	J	ļ,	ŧ	;	1	1	6.5E+01	6.6E+01	a	2.6E+04

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- 1. All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
- 2. Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
- 3. Metals measured as Dissolved, unless specified otherwise
- 4. *C* indicates a carcinogenic parameter
- 5. Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information. Antidegradation WLAs are based upon a complete mix.
- 6. Antideg. Baseline = (0.25(WQC background conc.) + background conc.) for acute and chronic
- = (0.1(WQC background conc.) + background conc.) for human health
- 7. WLAs established at the following stream flows: 1Q10 for Acute, 3QQ10 for Chronic Ammonia, 7Q10 for Other Chronic, 3QQ5 for Non-carcinogens and Harmonic Mean for Carcinogens. To apply mixing ratios from a model set the stream flow equal to (mixing ratio - 1), effluent flow equal to 1 and 100% mix.

Metal	Target Value (SSTV)	Note: do not use QL's lower than the
Antimony	6.4E+02	minimum QL's provided in agency
Arsenic	9.0E+01	guidance
Barium	na	
Cadmium	3.9E-01	
Chromium III	2.5E+01	
Chromium VI	6.4E+00	
Copper	2.8E+00	
lron	na	
Lead	3.4E+00	
Manganese	na	
Mercury	4.6E-01	
Nickel	6.8E+00	
Selenium	3.0E+00	
Silver	4.2E-01	
Zinc	2.6E+01	

1/26/2011 2:00:14 PM

Facility = Manassas WTP
Chemical = Chlorine
Chronic averaging period = 4
WLAa = 0.019
WLAc = 0.011
Q.L. = 0.1
samples/mo. = 1
samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = .2
Variance = .0144
C.V. = 0.6
97th percentile daily values = .486683
97th percentile 4 day average = .332758
97th percentile 30 day average = .241210
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Chronic Toxicity
Maximum Daily Limit = 1.60883226245855E-02
Average Weekly limit = 1.60883226245855E-02
Average Monthly LImit = 1.60883226245855E-02

The data are:

0.2

3/1/2011 9:23:06 AM

```
Facility = Manassas Water Treatment Plant
Chemical = TBT
Chronic averaging period = 4
WLAa = 0.46
WLAc = 0.072
Q.L. = 0.03
# samples/mo. = 1
# samples/wk. = 1
Summary of Statistics:
# observations = 14
```

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# observations = 14

Expected Value =

Variance =

C.V. =

97th percentile daily values =

97th percentile 4 day average =

97th percentile 30 day average=

# < Q.L. = 14

Model used =
```

No Limit is required for this material

The data are:

0

DMR QA/QC

Permit #:VA0050181

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Lim Max	CONC	Lim Avg	CONC	INC MIN Lim Min CONC	CONC MIN	Lim Max	QTY MAX	Lim Avg	OTY AVG	Parameter QTY AVG Lim Avg QTY MAX Lim Max CO Description	Rec'd	Outfall	Due

DMR QA/QC

Permit #:VA0050181

Due	Outfall	Rec'd	Parameter QTY AVG Lim Avg QTY MAX Lim Max COI Description	OTY AVG	Lim Avg	ОТУ МАХ	Lim Max	CONC MIN	NC MIN Lim Min	CONC Lim Avg	Lim Avg	CONC	Lim Max
10-Nov-2006	001	10-Aug-2006	TRIBUTYLTI N	NULL		NULL	*****	NULL	****	<0.18	NL NL	<0.18	NE
10-May-2007	001	09-Feb-2007	TRIBUTYLTI	NUL	***************************************	NULL	*******	NUL	***************************************	<0.18	N.	<0.18	<u>¥</u>
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10-May-2008	001	08-Feb-2008	TRIBUTYLTI N	N L	***************************************	NOL	*******	NULL	*	<0.04	NE.	<0.04	NE.
10-Nov-2008	001	10-Nov-2008	TRIBUTYLTI N	NULL		NULL		NULL		<0.04	≩	6. 9 4	¥
10-Nov-2009	001	10-Aug-2009	TRIBUTYLTI N	NOTE	***************************************	NOLL	-	NULL	-	<0.04	N.	^0.04	ž
10-May-2010	001	09-Feb-2010	TRIBUTYLTI	NUL	-	NEL	-	NULF		<0.04	¥	60.04	N.
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DMR QA/QC

Permit #:VA0050181 Facility:Manassas City Water Treatment Plant

Due	Outfall	Param	eter	CONC	MIN
10-May-06	001	. Р	Ή	6	.49
10-Jun-06	001	P	Н		.54
10-Aug-06	001	· P	Н	6	.54
10-Nov-06	001	· P	Н	6	.43
10-Feb-07	001	Р	Н	6	.77
10-May-07	001	· P	Н	6	5.2
10-Aug-07	001	· Р	Н	6	6.6
10-Nov-07	001	• Р	Н	6	3.5
10-Feb-08	001	, Р	Н	6	3.5
10-May-08	001	• Р	Н		Χ
10-Aug-08	001	· P	Н	6	.22
10-Nov-08	001	, P	Н	6	.38
10-Feb-09	001	P	Н	6	6.9
10-May-09	001	• Р	H	7	7 .1
10-Aug-09	001	' Р	Н	7	7.3
10-Nov-09	001	· Р	H	6	.98
10-Feb-10	001	· P	Н	7	'.5
10-May-10	001	• Р	H	6	.32
10-Aug-10	001	• Р	H	6	.29
10-Nov-10	001	P	Н	6	.54
	90% pH =			7.	.14

Public Notice - Environmental Permit

PURPOSE OF NOTICE: To seek public comment on a draft permit from the Department of Environmental Quality that will allow the release of treated industrial wastewater and storm water into a water body in Prince William County, Virginia.

PUBLIC COMMENT PERIOD: March 8, 2011 to 5:00 p.m. on April 6, 2011

PERMIT NAME: Virginia Pollutant Discharge Elimination System Permit – Industrial wastewater and storm water issued by DEQ, under the authority of the State Water Control Board

APPLICANT NAME, ADDRESS AND PERMIT NUMBER: City of Manassas, 8500 Public Works Drive, Manassas, VA 20110, VA0050181

NAME AND ADDRESS OF FACILITY: Manassas Water Treatment Plant, 14329 Glenkirk Road, Nokesville, VA 20181. This facility is an Exemplary Environmental Enterprise participant in Virginia's Environmental Excellence Program.

PROJECT DESCRIPTION: The City of Manassas has applied for a reissuance of a permit for the public Manassas Water Treatment Plant. The applicant proposes to release treated industrial wastewater and storm water at a maximum rate of 1.0 million gallons per day into a water body. Solids from the treatment process will be transported to the Upper Occoquan Sewage Authority for disposal. The facility proposes to release the treated industrial wastewater and storm water in Broad Run in Prince William County in the Potomac River watershed. A watershed is the land area drained by a river and its incoming streams. The permit will limit the following pollutants to amounts that protect water quality: pH, Total Suspended Solids, and Total Residual Chlorine. The permit will also require annual monitoring for Acute Toxicity using *P. promelas* and *C. dubia*.

HOW TO COMMENT AND/OR REQUEST A PUBLIC HEARING: DEQ accepts comments and requests for public hearing by e-mail, fax or postal mail. All comments and requests must be in writing and be received by DEQ during the comment period. Submittals must include the names, mailing addresses and telephone numbers of the commenter/requester and of all persons represented by the commenter/requester. A request for public hearing must also include: 1) The reason why a public hearing is requested. 2) A brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit. 3) Specific references, where possible, to terms and conditions of the permit with suggested revisions. A public hearing may be held, including another comment period, if public response is significant, based on individual requests for a public hearing, and there are substantial, disputed issues relevant to the permit.

CONTACT FOR PUBLIC COMMENTS, DOCUMENT REQUESTS AND ADDITIONAL INFORMATION: The public may review the documents at the DEQ-Northern Regional Office by appointment, or may request electronic copies of the draft permit and fact sheet.

Name: Susan Mackert

Address: DEQ-Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193 Phone: (703) 583-3853 E-mail: susan.mackert@deq.virginia.gov Fax: (703) 583-3821

<u>State "Transmittal Checklist" to Assist in Targeting</u> <u>Municipal and Industrial Individual NPDES Draft Permits for Review</u>

Part I. State Draft Permit Submission Checklist

In accordance with the MOA established between the Commonwealth of Virginia and the United States Environmental Protection Agency, Region III, the Commonwealth submits the following draft National Pollutant Discharge Elimination System (NPDES) permit for Agency review and concurrence.

Facility Name:	Manassas WTP	
NPDES Permit Number:	VA0050181	
Permit Writer Name:	Susan Mackert	
Date:	February 8, 2011	

Major [] Minor [X] Industrial [X] Municipal []

I.A. Draft Permit Package Submittal Includes:	Yes	No	N/A
1. Permit Application?	X		
2. Complete Draft Permit (for renewal or first time permit – entire permit, including boilerplate information)?	X		
3. Copy of Public Notice?	X		
4. Complete Fact Sheet?	X		
5. A Priority Pollutant Screening to determine parameters of concern?	X		
6. A Reasonable Potential analysis showing calculated WQBELs?	X		1
7. Dissolved Oxygen calculations?			X
8. Whole Effluent Toxicity Test summary and analysis?	X		
9. Permit Rating Sheet for new or modified industrial facilities?	X		

I.B. Permit/Facility Characteristics	Yes	No	N/A
1. Is this a new, or currently unpermitted facility?		X	
2. Are all permissible outfalls (including combined sewer overflow points, non-process water and storm water) from the facility properly identified and authorized in the permit?	х		
3. Does the fact sheet or permit contain a description of the wastewater treatment process?	X		
4. Does the review of PCS/DMR data for at least the last 3 years indicate significant non-compliance with the existing permit?		X	
5. Has there been any change in streamflow characteristics since the last permit was developed?		X	
6. Does the permit allow the discharge of new or increased loadings of any pollutants?	X		
7. Does the fact sheet or permit provide a description of the receiving water body(s) to which the facility discharges, including information on low/critical flow conditions and designated/existing uses?	х		
8. Does the facility discharge to a 303(d) listed water?	X		
a. Has a TMDL been developed and approved by EPA for the impaired water?	X		
b. Does the record indicate that the TMDL development is on the State priority list and will most likely be developed within the life of the permit?			Х
c. Does the facility discharge a pollutant of concern identified in the TMDL or 303(d) listed water?		X	
9. Have any limits been removed, or are any limits less stringent, than those in the current permit?		X	

I.B. Permit/Facility Characteristics – cont.	Yes	No	N/A
10. Does the permit authorize discharges of storm water?	X		
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?		X	
13. Do any water quality-based effluent limit calculations differ from the State's standard policies or procedures?		X	
14. Are any WQBELs based on an interpretation of narrative criteria?		X	
15. Does the permit incorporate any variances or other exceptions to the State's standards or regulations?		X	
16. Does the permit contain a compliance schedule for any limit or condition?		X	
17. Is there a potential impact to endangered/threatened species or their habitat by the facility's discharge(s)?		X	
18. Have impacts from the discharge(s) at downstream potable water supplies been evaluated?	X		
19. Is there any indication that there is significant public interest in the permit action proposed for this facility?		X	
20. Have previous permit, application, and fact sheet been examined?	X		

Part II. NPDES Draft Permit Checklist

Region III NPDES Permit Quality Review Checklist – For Non-Municipals

II.A. Permit Cover Page/Administration	Yes	No	N/A
1. Does the fact sheet or permit describe the physical location of the facility, including latitude and longitude (not necessarily on permit cover page)?	X		
2. Does the permit contain specific authorization-to-discharge information (from where to where, by whom)?	х		
II.B. Effluent Limits – General Elements	Yes	No	N/A
 Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)? 	x		
2. Does the fact sheet discuss whether "antibacksliding" provisions were met for any limits that are less stringent than those in the previous NPDES permit?	X		
II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ)	Yes	No	N/A
1. Is the facility subject to a national effluent limitations guideline (ELG)?		X	
a. If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source?			X
b. If no, does the record indicate that a technology-based analysis based on Best Professional Judgement (BPJ) was used for all pollutants of concern discharged at treatable concentrations?		X	
2. For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?	X		
3. Does the fact sheet adequately document the calculations used to develop both ELG and /or BPJ technology-based effluent limits?	х		
4. For all limits that are based on production or flow, does the record indicate that the calculations are based on a "reasonable measure of ACTUAL production" for the facility (not design)?			Х
5. Does the permit contain "tiered" limits that reflect projected increases in production or flow?		X	
a. If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained?			X
6. Are technology-based permit limits expressed in appropriate units of measure (e.g., concentration, mass, SU)?			Х
7. Are all technology-based limits expressed in terms of both maximum daily, weekly average, and/or monthly average limits?			X
8. Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ?		X	
II.D. Water Quality-Based Effluent Limits	Yes	No	N/A
 Does the permit include appropriate limitations consistent with 40 CFR 122.44(d) covering State narrative and numeric criteria for water quality? 	X		
2. Does the record indicate that any WQBELs were derived from a completed and EPA approved TMDL?		X	
3. Does the fact sheet provide effluent characteristics for each outfall?	X		
4. Does the fact sheet document that a "reasonable potential" evaluation was performed?	X		Name of
a. If yes, does the fact sheet indicate that the "reasonable potential" evaluation was performed in accordance with the State's approved procedures?	X		
b. Does the fact sheet describe the basis for allowing or disallowing in-stream dilution or a mixing zone?	X		

	Limits – cont.	Yes	No	N/A
have "reasonable potential"?	calculation procedures for all pollutants that were found to	X	>	
d. Does the fact sheet indicate that	he "reasonable potential" and WLA calculations accounted			
concentrations where data are a			X	
potential" was determined?	effluent limits for all pollutants for which "reasonable	X		
5. Are all final WQBELs in the permit provided in the fact sheet?	consistent with the justification and/or documentation	Х		
For all final WQBELs, are BOTH lo maximum daily, weekly average, in	ong-term (e.g., average monthly) AND short-term (e.g., stantaneous) effluent limits established?	X		
concentration)?	nit using appropriate units of measure (e.g., mass,	х		
8. Does the fact sheet indicate that an 'the State's approved antidegradatio	'antidegradation' review was performed in accordance with n policy?	X		
II.E. Monitoring and Reporting Req		Yes	No	N/A
1. Does the permit require at least annual	nal monitoring for all limited parameters?	X		
a. If no, does the fact sheet indicate	that the facility applied for and was granted a monitoring pecifically incorporate this waiver?			x
	l location where monitoring is to be performed for each	х		
3. Does the permit require testing for V standard practices?	Vhole Effluent Toxicity in accordance with the State's	х		
II.F. Special Conditions		Yes	No	N/A
1. Does the permit require developmer	t and implementation of a Best Management Practices	100	X	
(BMP) plan or site-specific BMPs?				第188311
a. If yes, does the permit adequately	incorporate and require compliance with the BMPs?		N. C.	X
a. If yes, does the permit adequately2. If the permit contains compliance so deadlines and requirements?	incorporate and require compliance with the BMPs? hedule(s), are they consistent with statutory and regulatory			X
a. If yes, does the permit adequately2. If the permit contains compliance so deadlines and requirements?	incorporate and require compliance with the BMPs? hedule(s), are they consistent with statutory and regulatory nbient sampling, mixing studies, TIE/TRE, BMPs, special	X		
 a. If yes, does the permit adequately 2. If the permit contains compliance so deadlines and requirements? 3. Are other special conditions (e.g., ar 	incorporate and require compliance with the BMPs? hedule(s), are they consistent with statutory and regulatory nbient sampling, mixing studies, TIE/TRE, BMPs, special	X	No	
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 a. If yes, does the permit adequately 2. If the permit contains compliance so deadlines and requirements? 3. Are other special conditions (e.g., ar studies) consistent with CWA and N II.G. Standard Conditions 1. Does the permit contain all 40 CFR more stringent) conditions? List of Standard Conditions – 40 CFR 	incorporate and require compliance with the BMPs? hedule(s), are they consistent with statutory and regulatory mbient sampling, mixing studies, TIE/TRE, BMPs, special IPDES regulations? 122.41 standard conditions or the State equivalent (or	Yes X		X
 a. If yes, does the permit adequately 2. If the permit contains compliance so deadlines and requirements? 3. Are other special conditions (e.g., ar studies) consistent with CWA and N II.G. Standard Conditions 1. Does the permit contain all 40 CFR more stringent) conditions? List of Standard Conditions – 40 CFR Duty to comply 	incorporate and require compliance with the BMPs? hedule(s), are they consistent with statutory and regulatory nbient sampling, mixing studies, TIE/TRE, BMPs, special IPDES regulations? 122.41 standard conditions or the State equivalent (or 122.41 Property rights Reporting Requirements	Yes X		X
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Part III. Signature Page

Based on a review of the data and other information submitted by the permit applicant, and the draft permit and other administrative records generated by the Department/Division and/or made available to the Department/Division, the information provided on this checklist is accurate and complete, to the best of my knowledge.

Name	Susan Mackert	
Title	Environmental Specialist II Senior	
Signature	Chana Allacket	
Date	February 8, 2011	